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Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25
26 Defendant
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF ZUFFA,
LLC'S MOTION TO SEAL
PORTIONS OF PLAINTIFFS'
EMERGENCY MOTION FOR A
LETTER OF REQUEST FOR
DOCUMENTS FROM GROUP ONE
HOLDINGS PTE. LTD. AND
RELATED DOCUMENTS (ECF NO.
435)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bars of the states of New York and the
3 District of Columbia. I am admitted pro hac vice to practice before this Court. I am a Partner in the
4 law firm Boies Schiller Flexner LLP ("BSF"), counsel for Zuffa, LLC ("Zuffa") in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa's Motion to Seal Plaintiffs' Emergency
8 Motion for a Letter of Request for Documents from Group One Holdings Pte. Ltd. (ECF No. 435).

9 3. Except where otherwise stated, based on my review of the files, records, and
10 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,
11 if called to testify, could and would testify competently to those facts under oath.

12 4. I understand that Zuffa has a strong policy of not discussing and disclosing the terms
13 of its confidential settlement agreements publicly. I further understand that Zuffa zealously guards
14 this information and does not disclose such information to the public.

15 5. I further understand that Zuffa has a policy of not disclosing to any entity, except
16 where required by law, the documents it prepares for and submits in response to government
17 investigations and inquiries.

18 6. Exhibit 8 to this Declaration is a true and correct copy, with redactions applied, of the
19 version of Exhibit 8 to the Declaration of Kevin E. Rayhill in Support of Plaintiffs' Emergency
20 Motion for a Letter of Request for Documents from Group One Holdings Pte. Ltd. (ECF No. 433-2)
21 filed under seal.

22
23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing facts are true and correct. Executed this 26th day of June, 2017, in Washington, D.C.

25
26 /s/ Stacey K. Grigsby
27 Stacey K. Grigsby
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